

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

JASON RICHER,	:	
Plaintiff	:	
	:	
v.	:	C.A. No. 15-162-L-PAS
JASON PARMELEE as the Finance Director of	:	
THE TOWN OF NORTH SMITHFIELD,	:	
TOWN OF NORTH SMITHFIELD, and	:	
STEVEN E. REYNOLDS in his official	:	
capacity as Chief of the NORTH SMITHFIELD	:	
POLICE DEPARTMENT	:	
Defendants	:	

**PLAINTIFF'S OBJECTION TO DEFENDANTS' MOTION FOR ENLARGEMENT  
OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Plaintiff, Jason Richer, hereby objects to Defendants' motion for enlargement of time to respond to plaintiff's motion for partial summary judgment. While defendants state in their motion that they would like to concentrate their efforts on settlement, plaintiff points out that the parties have been working on settlement for almost two months and the plaintiff's most recent settlement demand has expired without a response. Additionally, a Rule 16 and/or settlement conference will not change the facts or the law applicable to this matter. While plaintiff would not object to a reasonable extension of time to file a response to the motion, say 30 days, there is no reason to delay plaintiff's motion for 90 days for the reasons listed by defendants as he has waited six years to receive the relief he is requesting. Therefore, Plaintiff respectfully requests that defendants' motion be denied or that the extension be limited to 30 days.

/s/ Thomas W. Lyons

Thomas W. Lyons #2946  
Rhiannon S. Huffman, Esq. #8642  
RHODE ISLAND AFFILIATE,  
AMERICAN CIVIL LIBERTIES UNION  
Strauss, Factor, Laing & Lyons  
One Davol Square, Suite 305  
Providence, RI 02903  
(401) 456-0700

Date: July 8, 2015

**CERTIFICATION**

I hereby certify that on July 8, 2015, a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system and served by email on Marc DeSisto, Esq., solicitor for the Town of North Smithfield. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons

S:\TWL\ACLU\Richer\Drafts\Richer Objection to D's M for Enlargement of Time to Respond to  
MPSJ.docx